

DOMINIC P. GENTILE, ESQ.
Nevada Bar No. 1923
MARK S. DZARNOSKI, ESQ.
Nevada Bar No. 3398
CLARK HILL PLC
1700 S. Pavilion Center Drive, Suite 500
Las Vegas, Nevada 89135
Telephone: (702) 862-8300
Facsimile: (702) 778-9709
E-mail: dgentile@clarkhill.com
mdzarnoski@clarkhill.com

WILLIAM F. COFFIELD, ESQ.,
(Admitted *Pro Hac Vice*)
MELVIN WHITE, ESQ.,
(Admitted *Pro Hac Vice*)
JARED R. BUTCHER, ESQ.,
(Admitted *Pro Hac Vice*)
BERLINER CORCORAN & ROWE LLP
1101 17th Street, NW, Suite 1100
Washington, D.C. 20036
Telephone: (202) 293-5555
E-mail: wcoffield@bclaw.com
mwhite@bclaw.com
jbutcher@bclaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LIXIN AZARMEHR *et al.*,
Plaintiffs,
v.

WELLS FARGO CLEARING SERVICES
LLC (a/k/a WELLS FARGO ADVISORS),
Defendant.

Case No. 2:25-cv-00088-APG-BNW

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT
AND SET BRIEFING SCHEDULE**

(First Request)

Plaintiffs Lixin Azarmehr; JL Real Estate Development Corporation; Nevada Skilled Nursing Lender, LLC; and Nevada Skilled Nursing Development, LLC (collectively “Plaintiffs”), and Defendant Wells Fargo Clearing Services, LLC (a/k/a Wells Fargo Advisors) (“Defendant”), by and through their undersigned counsel, hereby submit this Joint Stipulation to Extend Time to Respond to Complaint and Set Briefing Schedule.

Plaintiffs filed their complaint on January 14, 2025, and served Defendant on January 15, 2025. ECF Nos. 1, 6. On February 3, 2025, Defendant notified Plaintiffs that it intends to file a motion to dismiss the complaint. The parties conferred and agreed to jointly request that the Court extend the time for Defendant to respond to the complaint and enter the following schedule for the motion to dismiss:

- Defendant’s motion to dismiss is due by March 7, 2025
- Plaintiffs’ opposition is due by April 4, 2025
- Defendant’s reply is due by April 25, 2025
- Hearing on the motion is set for May 13, 2025 (or the Court’s next available hearing date)

The parties respectfully submit that proceeding this way would present the most efficient use of judicial and party resources.

This is the first request to extend the deadline for Defendant to respond to the complaint.

IT IS SO STIPULATED.

Dated: February 4, 2025

Respectfully submitted,

BERLINER CORCORAN & ROWE LLP

/s/ Jared R. Butcher

JARED R. BUTCHER*

1101 17th Street, NW, Suite 1100

Washington, D.C. 20036

E-mail: jbutcher@bcrllaw.com

Telephone: (202) 293-5555

**Admitted pro hac vice*

Attorneys for Plaintiffs

Dated: February 4, 2025

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

/s/ Emmet P. Ong

EMMET P. ONG*

Bryan Cave Leighton Paisner LLP

Three Embarcadero Center, 7th Floor

San Francisco, CA 94111-4070

E-mail: emmet.ong@bclplaw.com

Telephone: (415) 675 3459

**to be admitted pro hac vice*

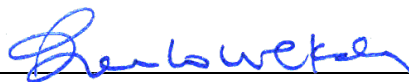
Attorneys for Defendant

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the foregoing stipulation is approved and the deadline for Defendant to file its motion to dismiss the complaint is March 7, 2025. Plaintiffs' opposition is due by April 4, 2025. Defendant's reply is due by April 25, 2025. ~~The Court will hold a hearing on the motion to dismiss on _____ 2025,~~
~~beginning at _____.~~ The Court will not set a hearing at this time.

DATED: February 5, 2025

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), and Section IV of the District of Nevada Electronic Filing Procedures, I hereby certify that I am an employee of Berliner, Corcoran & Rowe LLP and that on the 4th day of February 2025, I served a true and correct copy of the foregoing JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND SET BRIEFING SCHEDULE (FIRST REQUEST), via electronic service through the Court's CM/ECF Filing System, to all parties and counsel as identified on the court-generated Notice of Electronic Filing.

/s/ Jared R. Butcher

Jared Butcher